



LONG DISTANCE FLEET ADVISORY COUNCIL

Att.: Ms. Charlina VITCHEVA
Director General
DG MARE - Maritime Affairs and Fisheries
JII99, B-1000 BRUSSELS

Madrid, 29th May 2023
Ref: R-04-23/WG5

Subject: Support to the Resolution of the social partners in the sea-fisheries sector on the fight against forced labour

Dear Ms. Vitcheva,

The LDAC wishes to highlight the importance of the social dimension in the fisheries sector, which includes guarantying fundamental decent working and living conditions, which are key social policies required to deter forced labour and abuses in fisheries.

After the Commission's proposal for a regulation prohibiting products made with forced labor on the Union market, the social partners agreed on a Resolution on the fight against forced labor in the fisheries sector¹.

From the LDAC, we wish to strongly support the Resolution of the social partners as we believe that the EU and its Member States should play a leading role in promoting decent working conditions in fisheries worldwide.

In addition, in a recent LDAC advice on Level Playing Field², we underlined that the fleets that do not apply to decent working and living conditions take advantages of unfair competition when fish products enter the Union's market³.

The LDAC would encourage the Commission to be open to more ambitious ideas as the legislative process progresses. In particular, it should consider recommendations inspired from the IUU Regulation suggested in the aforementioned advice, including, among others, a role for the Commission to take measures against third countries where forced labour practices are systemic.

Echoing paragraph (12) of the social partners' Resolution, the LDAC and its members would also like to emphasise the key role we can play in the enforcement of this regulation through the

¹ Vid. https://ldac.eu/images/Social_Partners_resolution_on_forced_labour_30Jan2023.pdf

² Vid. Chapter III: on International instruments related to social aspects (including labour rights) of LDAC advice on Level Playing Field: https://ldac.eu/images/EN_LDAC_Advice_LPF_25May2021.pdf

³ Vid. The case study of Vietnam (Annex III) concerning labor abuses and human rights violations in third countries that have signed trade agreements with the EU https://ldac.eu/images/EN_LDAC_Advice_LPF_25May2021.pdf



submission of information, given our unique position as the advisory council meant to provide evidence-based advice on distant fisheries-related issues.

Furthermore, the LDAC would also encourage the Commission to carefully consider its own role in ensuring Member States coordinate investigations and the enforcement of bans in a uniform way so as to avoid differing standards across the Union as highlighted in paragraph (11) of the Resolution.

Yours sincerely,



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